

# Section Nine

## Coordination of Local Mitigation Planning

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### 9.1 IFR Requirements for Coordination of Local Mitigation Planning

A key element of the DMA 2000 is the emphasis placed on strengthening the interactions between the states and local communities regarding hazard mitigation planning and implementation. Most significant mitigation occurs at the "local" level so it is beneficial to all concerned to make sure that local plans are as effective as possible in identifying hazards and developing action plans.

The IFR includes three specific requirements for the manner in which states coordinate with local communities for planning efforts:

- **Local Funding and Technical Assistance per Requirement §201.4(c)(4)(i):** "[The section on the Coordination of Local Mitigation Planning must include a] description of the State process to support, through funding and technical assistance, the development of local mitigation plans..."
- **Local Plan Integration per Requirement §201.4(c)(4)(ii):** "[The section on the Coordination of Local Mitigation Planning must include a] description of the State process and timeframe by which the local plans will be reviewed, coordinated, and linked to the State Mitigation Plan."
- **Prioritizing Local Assistance per Requirement §201.4(c)(4)(iii):** "[The section on the Coordination of Local Mitigation Planning must include] criteria for prioritizing communities and local jurisdictions that would receive planning and project grants under available funding programs, which should include consideration for communities with the highest risks, repetitive loss properties, and most intense development pressures. Further, that for non-planning grants, a principal criterion for prioritizing grants shall be the extent to which benefits are maximized according to a cost benefit review of proposed projects and their associated costs."

### 9.2 Local Funding and Technical Assistance

As described in Section Eight, the Plan emphasizes the need for the State to provide continuing funding and technical assistance to support mitigation planning at the parish and local community level. To gain perspective on what needs to be done in the future, it is important to also understand what has been accomplished to date.

The State of Louisiana, through OHSEP, has made a concerted effort to assist with the local plan development process by providing:

- Support to obtain Federal funding for local and parish level plan development;
- Technical assistance to plan preparers at the local and parish level;

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- Plan reviews at draft and final stages of completion; and
- Coordination with FEMA Region VI on local plan development and review issues.

### Current Status of Local Mitigation Planning in Louisiana

As of February 16, 2005, 63 parish level, 11 local community and 1 private non-profit organization plans have been undertaken in the State of Louisiana. One measure of the effectiveness of this planning effort is the percentage of the State's citizens who will be "covered" by a local hazard mitigation plan. Since the parish is the political unit of interest and can provide full coverage for all the communities within its boundaries, the SHMPC considered it appropriate to determine the percent coverage of the parishes represented by this number. There are a total of 64 parishes in the State; two of these parishes have undertaken a joint regional planning process so the number of parish plans required to cover the entire State is 63. With 63 parish plans completed or underway, the resulting level of compliance is 100 percent.

### Current Funding

To date, a total of \$3,638,375 has been dedicated to developing parish and local level plans. Table 9-1 includes a summary of the funding sources for these plans:

Table 9-1: Funding Sources for Local Hazard Mitigation Planning

Funding Sources	Amount
HMGP	\$1,839,000
PDM	\$ 461,300.
FMA	\$ 610,400
Non-Federal (local)	\$ 727,675.
<b>Total</b>	<b>\$3,638,375.</b>

Source: OHSEP, 2005

### Technical Assistance for Local Mitigation Planning

OHSEP, with funding provided by FEMA through HMTAP, conducted a series of local hazard mitigation planning workshops in 2002 to familiarize parish officials with the requirements of DMA 2000 and to offer training regarding hazard mitigation planning techniques per FEMA guidance. Five separate workshops were held and 56 of the 64 parishes participated in at least one workshop; a rate of 87%.

### Continuing Technical Assistance

Per Section Eight, OHSEP intends to provide continued technical assistance to parishes and local communities in the State to develop and maintain comprehensive local mitigation plans and to pursue cost effective mitigation projects. For example, Plan of Action 'E' in Section Eight identifies specific steps OHSEP will take to support local hazard mitigation planning. Other action items include providing training and guidance for improving risk assessments and plan implementation that are important aspects of the overall process.

### Plan Reviews

As of February 16, 2005, one local plan has been approved by FEMA.

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OHSEP has reviewed a significant number of local and parish hazard mitigation plans and has made a commitment to provide the same level of service for all local planning efforts in Louisiana. Throughout the development and review process, OHSEP staff has, and will continue, to serve as liaisons between FEMA Region VI and the local jurisdictions. OHSEP staff was trained by FEMA to conduct plan reviews and the process OHSEP employs is as follows:

- Step 1: The initial draft of a local parish plan is sent to OHSEP, reviewed and then forwarded with OHSEP comments to FEMA Region VI.
- Step 2: FEMA Region VI reviews the plan and forwards their comments to OHSEP who then relays them back to the parish.
- Step 3: The parish addresses both OHSEP and FEMA Region VI comments and revises the plan.
- Step 4: A revised final draft is submitted to OHSEP, is checked and forwarded to FEMA Region VI.
- Step 5: FEMA Region VI again reviews the plan, and if all comments were satisfactorily addressed, a letter stating that the plan is adoptable is mailed to OHSEP and the parish. In cases where comments have not been addressed satisfactorily, the parish again addresses the comments and repeats the process.
- Step 6: The plan is then formally adopted by all participating jurisdictions.
- Step 7: The plan is officially approved by the Regional Director of FEMA Region VI.

The timeframe for this review process is about six months, not including the time spent by communities and parishes to revise their plans in response to comments (in Steps 3 and 6), based on the following assumptions:

- Step 1 requires approximately 45 days for State review;
- Step 2 requires an additional 45 days for FEMA; and
- After resubmitting the plan for final review, the State is again given 45 days to review and FEMA is also given 45 days in Step 5.

Some local plans were being developed concurrently with the State Plan; they will be completed as outlined in their individual grant agreements between the OHSEP and local EMAs. Once finalized, the local plans will be sent to FEMA Region VI for official approval as required to satisfy DMA 2000 requirements.

### 9.3 Local Plan Integration

As described in Subsection 9.1, the IFR requirements pertaining to this Section, 201.4(c)(4)(ii) states that “[The section on the Coordination of Local Mitigation Planning must include a] description of the State process and timeframe by which the local plans will be reviewed, coordinated, and linked to the State Mitigation Plan.” In developing the State Plan, OHSEP was aware of the importance of ongoing local planning efforts. Ideally, the process for developing the Plan would have used local risk assessments, goals, strategies and actions to help characterize the range of hazards, mitigation strategies and actions identified across the State. However, at the time most of this Plan was written, no local or parish plans had been approved by FEMA Region VI and thus the contents of plans that have been subsequently approved were not available to link with this Plan.

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While all 64 parishes were contacted as part of the local capability assessment (as described in Section Seven), the information gathered as part of that effort was limited in scope. Therefore, most of the parish plan integration into this Plan must still be performed by OHSEP and the SHMPC as described below.

As part of integrating parish plans with this Plan OHSEP will undertake a review process to identify and compile key elements for further analysis (as outlined in Section Ten. The intent is to identify common characteristics in the local plans and analyses to incorporate into the State Plan. For example, data about local risk will be extracted and compared with the results of other local plans regarding:

- breadth of hazard coverage;
- level of detail in data and analyses; and
- file formats for digital information.

In addition, OHSEP will consider non-technical aspects for incorporation into the State Plan including goals, objectives and capability assessments for local communities and parishes.

Upon completion, the local plan information will be presented to the SHMPC with recommendations about how it may be included in subsequent updates to the State Plan. OHSEP anticipates that this will occur about the end of calendar year 2005, although the timing of this activity may change depending on the complexity and completeness of the local plans, and data compatibility among them.

Following analysis and consideration by the SHMPC, OHSEP anticipates that most of the usable local risk assessment and vulnerability data will be incorporated into the State Plan within two years of its initial approval, probably as part of the annual review and update process described in Section Ten.

It is clear that local conditions and priorities will change over time. To account for this, in addition to assembling and reviewing the approved local plans, the OHSEP will correspond with local EMA directors and other appropriate officials and organizations on an annual basis, requesting them to advise OHSEP of any significant changes in local vulnerability and risk, mitigation activities that have been completed or initiated, and changes in a community's mitigation goals, strategies or priorities. OHSEP will review the responses, prepare a report and recommendations, and present these to the SHMPC for its consideration.

### 9.4 Prioritizing Local Assistance

IFR subsection 201.4(c)(4)(iii) states that the State Hazard Mitigation Plan must include "[c]riteria for prioritizing communities and local jurisdictions that would receive planning and project grants under available funding programs, which should include consideration for communities with:

- highest risk,
- repetitive loss properties, and
- most intense development pressures.

Further, that for non-planning grants, a principal criterion for prioritizing grants shall be the extent to which benefits are maximized according to a cost benefit review of proposed projects and their associated costs."

The sub-sections below discuss these four criteria. Following these subsections is additional discussion of how the State intends to prioritize applications for funding future planning efforts.

In all cases applicants must demonstrate that their risk is sufficient to merit grant funds, particularly when compared to the project cost, but there is often considerable uncertainty in risk determinations. For this and other reasons, the State considers a variety of factors in addition to risk and benefit-cost analysis in determining its priorities for mitigation grants.

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### **Jurisdictions with highest risk**

One of the primary purposes of this Plan is to identify the areas in Louisiana with the highest risk from natural and manmade hazards. As described in Section Five, the parishes in Louisiana have different levels of exposure and risk. Although the State does not have a formal system established to evaluate and prioritize potential mitigation projects on the basis of risk, this Plan is partly intended to begin the process of introducing such a structure to the process. In general, the State will direct mitigation grant funds to the areas with the highest risk. However, in many cases, more localized risk assessments (possibly produced in the local mitigation planning process), as well as risk assessments and benefit-cost analyses done in support of applications, may indicate areas with high risk outside the highest-risk parishes identified in this Plan.

It is also worth noting that the most worthwhile mitigation projects are a product of both the risk in a particular place and the effectiveness of a project. Although risk is clearly a good initial indicator of mitigation potential, the State will also carefully consider the effectiveness and cost of mitigation projects in determining funding priorities.

### **Jurisdictions with repetitive loss properties**

There is currently no formal requirement that grants made through either the HMGP or PDM-C emphasize repetitive loss properties. However, in response to the Federal emphasis on reducing the burden that repetitive losses place on the NFIP, the State presently considers the repetitive loss status of properties in determining the grants it will support (i.e., forward to FEMA for consideration and funding), and will continue to do so as additional grant funds are available. As discussed elsewhere in the overall strategy for Louisiana, the State is in the process of developing a more rigorous process for evaluating grants. As part of that effort, the State is incorporating repetitive loss status into its grant evaluation criteria.

The FMA program mandates that grant funds are directed to NFIP repetitive loss properties, and the State will continue to comply with this requirement as it has since its inception. It is worth noting that the Flood Insurance Reform Act of 2004, which was signed into law by the President on June 30, 2004, reforms the NFIP to provide a disincentive to property owners to live in repetitively flooded areas. Rather than continue to rebuild, the program would provide repeatedly flooded homeowners assistance in either elevating or moving their homes away from floodwaters. Those who refuse mitigation assistance would pay premiums that will progressively approach the full actuarial costs for choosing to live in a risky area.

### **Jurisdictions with most intense development pressure**

At the time this Plan was developed Louisiana had no formal process for evaluating potential mitigation grants. As it develops a more rigorous review and recommendation process, the State will include development pressure as a potential review criterion. It is assumed that parish plans will provide some indication of the implications of future development per DMA 2000 requirements for local plans. The degree to which this information is included in the local plans will determine to a large extent the ability of OHSEP and the SHMPC to make decisions based on this criteria.

Although development pressure is clearly a potential factor in any risk determination, development that is undertaken in accordance with adequate building codes, land planning and floodplain management principles should in many cases be less risky than development that pre-dates these codes and principles. However, the State is aware that increased development does cause related increases in population, infrastructure, etc., and may in some cases have adverse impacts on existing areas. These factors will be carefully considered in additional reviews.

### **Maximizing benefits according to benefit-cost review of local projects**

The regulations that apply to all FEMA mitigation grant programs (HMGP, PDM-C, and FMA) state that proposed mitigation projects must be cost effective. Under some pre-established conditions, certain projects may be exempt from this regulation, but in most cases a benefit-cost analysis is undertaken for projects either prior to being submitted to OHSEP and FEMA for funding consideration, or during the grant evaluation process.

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The PDM-C program, which was instituted in 2003/04, further emphasizes the role of cost-effectiveness by making the benefit-cost ratio the single most important criterion in project rating and evaluation. For the HMGP and FMA programs, the regulations require only that proposed mitigation projects are cost-effective, *not* that they are the *most* cost-effective of projects that the State or FEMA is considering. However, the State generally believes that projects with high benefit cost ratios should get preference, all other aspects being equal.

In most cases, grant applications are either accompanied by a benefit-cost analysis, or OHSEP or FEMA performs one in accordance with FEMA and the Office of Management and Budgets (OMB) regulations. Projects that do not achieve the required 1.0 benefit-cost ratio, and are not exempted from benefit-cost analysis, are rejected from funding consideration. This is the case for all three FEMA mitigation grant programs (HMGP, PDM-C, and FMA).

### **Prioritization of communities to receive planning grants**

In determining priorities for which communities will receive mitigation planning grants, OHSEP will consider several criteria:

- Quality and completeness of the community's existing mitigation plan.
- The degree of risk in the community, as determined by the potential effects of natural hazards on population, infrastructure and operations per the results of this Plan.
- Existing capability, i.e., if the community already has the resources to create or update its plan and do they have the administrative infrastructure in place to implement actions.
- Potential for the plan to support or enhance community mitigation efforts.

These criteria are intended to blend objective and subjective considerations to determine the best way to spend limited funds to help communities improve their mitigation plans.

Although the preceding subsections discuss specific criteria required by the IFR, the State considers other factors in determining how to prioritize mitigation grant proposals. Among these other factors are:

- The extent to which the project identified by the community has been identified or developed through the local hazard mitigation process;
- Local needs, (i.e., which grants would help communities most);
- The hazard or hazards that the project is mitigating;
- The criticality of the facility/ies that the project is protecting;
- The status of a community with respect to the NFIP / CRS; and
- The community's adoption and enforcement of building codes.

This is not intended as a comprehensive list of factors, only as a general indication of the areas that the State will contemplate in reviewing project proposals.